

Honorable Commissioners:

I believe that RM-10620 lacks merit for the following reasons:

The mechanism for upgrading from Novice to Technician is well established. It requires only that the Novice-class licensee pass the Technician-class examination. This examination is not particularly difficult, as evidenced by the number of children who pass it every day. I believe that anyone still holding a Novice class license after 20 years knows how to upgrade, but is not sufficiently interested to make the effort.

The same situation applies to the Advanced-class operator wishing to upgrade to Amateur Extra. The Amateur Extra exam is far more difficult than the Technician exam, but is comparable to the Advanced class examination already completed. Anyone holding an Advanced-class license for 20 years knows what is required to upgrade to Amateur Extra, but lacks sufficient interest to develop and/or demonstrate the appropriate skill and knowledge.

As I understand it, the purpose of FCC licensing examinations is to determine if the applicant's technical and operating skills are commensurate with the privileges conveyed by the license. If that still is the reason for testing applicants, RM-10620 violates that purpose and therefore has no merit.

I respectfully suggest that RM-10620 be rejected.

Sincerely,

Don Murray
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